

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CRYSTAL SANCHEZ, *et al.*, *on behalf of
themselves and all those similarly situated*,

Plaintiffs,

v.

SANTANDER BANK, N.A., *et al.*,

Defendants.

Case No.: 3:17-cv-05775-PGS-DEA

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS AND COLLECTIVE SETTLEMENT AND RELATED RELIEF**

For the reasons set forth in the attached Memorandum of Law in Support of this Motion for Final Approval, Plaintiffs respectfully request this Court enter an Order:

1. Granting final approval to the FLSA Collective Action and Rule 23 Class Action Settlement, ECF Doc. No. 216-3 (the "Settlement Agreement"), and ordering that all Eligible Settlement Class Members who did not opt out are subject to the release of claims set forth therein;
2. Ordering Defendants, pursuant to the Settlement Agreement, to deposit the "Gross Settlement Amount" (\$4,250,000.00) into the Qualified Settlement Fund no later than 30 days from the Date of the Court's Order (*See* Settlement Agreement at ¶ 3.1(A)-(B));
3. Ordering the Settlement Administrator to distribute, consistent with the terms of the Settlement Agreement, the Net Settlement Fund to Eligible Settlement Class Members who did not opt out of the Settlement;

4. Granting Service Awards of \$10,000 for Named Plaintiff Crystal Sanchez, and Service Awards of \$5,000.00 each for Named Plaintiffs Rabia Ahmed, Andrea Blanchard, Pearl Monteiro, Shaunsey Jackson, Michelle Romano, Joni Henderson, and Peter Sano;

5. Granting Class Counsel's request for reasonable attorneys' fees representing 33 1/3% of the Gross Settlement Amount totaling \$1,416,666.00;

6. Granting Class Counsel's request for reimbursement of their out-of-pocket litigation costs, totaling \$24,038.83.

7. Granting the Settlement Administrator its reasonable fees and costs incurred in administering the Settlement to be paid from the Gross Settlement Amount.

Respectfully Submitted,

/s/ Justin L. Swidler, Esq.

Justin L. Swidler, Esq.

Richard S. Swartz, Esq.

SWARTZ SWIDLER, LLC

1101 Kings Highway North, Ste. 402

Cherry Hill, NJ 08034

Phone: (856) 685-7420

Fax: (856) 685-7417

Stephan T. Mashel, Esq.

Amy C. Blanchfield, Esq.

MASHEL LAW, LLC

500 Campus Drive, Suite 303

Morganville, NJ 07751

Phone: (732) 536-6161

Fax: (732) 536-6165

Dated: May 24, 2022

